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March 6, 2023

Hon. Sharon A. King, U.S.M.J.
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets, Courtroom 3C
Camden, NJ 08101

Re: Jane Doe v. Marty Small, Sr., et al.
Civil Action No. 1:21-cv-11189-JHR-SAK

Dear Magistrate Judge King:

As Your Honor may be aware, I have entered an appearance on behalf of defendant, La-Quetta Small, in the above matter. This case is scheduled for an initial scheduling conference before Your Honor tomorrow, March 7, 2023 at 10:30 a.m. by telephone.

With consent of plaintiff's counsel, I am requesting an adjournment of the initial conference. Late on Friday, March 3, 2023, plaintiff filed a Second Amended Complaint pursuant to leave granted by Judge Rodriguez and his Order of February 2, 2023. The defendant Small has not yet had the opportunity to review and evaluate the Second Amended Complaint and the same must be reported to the School District's Joint Insurance Fund for confirmation of coverage.

As such, the parties have not had sufficient opportunity to meet and confer and establish a Joint Discovery Plan. In my view, the initial conference would be far more productive after the filing of a responsive pleading by Ms. Small in the coming days.

Thank you for Your Honor's consideration.

Respectfully yours,

/s/ Jeffrey L. Shanaberger

Jeffrey L. Shanaberger

JLS/pm

cc: Samuel Jackson, Esq.